

March 7, 2014

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: Connect America Fund, WC Docket No. 10-90

Nonbinding Expression of Interest

Dear Ms. Dortch:

NTUA Wireless, LLC ("NTUA Wireless" or "Company") submits this letter as its nonbinding expression of interest to conduct an experiment to deploy high-speed, scalable, IP-based network using wireless technologies in rural, high-costs areas with *Connect America* funding¹. The following paragraphs provide the information suggested by the Commission for expressions of interest:

- 1. Nature of submitting entity: NTUA Wireless is a limited liability company ("LLC") that was created by the Navajo Tribal Utility Authority ("NTUA") and Commnet Wireless LLC ("Commnet"). NTUA Wireless is majority-owned by NTUA, a Tribal enterprise of the Navajo Nation. NTUA Wireless has a first-hand understanding of the setting and how to overcome the challenges of providing utility services to the Navajo Nation. Therefore, NTUA Wireless is uniquely qualified to provide un-served and underserved areas and low income residents much-needed wireless telecommunications services tailored to the needs of the Navajo Nation. The Navajo Nation covers a land area of over 27,000 square miles and extends into all or part of 13 counties in the states of Arizona, New Mexico and Utah. NTUA Wireless was recently designated Eligible Telecommunications Carrier ("ETC") status for purposes of participating in the Tribal Mobility Fund Auction ("Auction 902") and offering Lifeline services within the Navajo Nation.
- 2. Identification of proposed service area: NTUA Wireless proposes to conduct the experiment in the all or some of the eligible census tracts that are identified in Attachment A.

 $^{^1}$ See Connect America Fund, WC Docket No. 10-90, FCC 14-5, at $\P\P 104$ and 105 (rel January 31, 2014).

- 3. The broadband technologies to be deployed: NTUA Wireless anticipates it will deploy fixed and mobile broadband service via LTE technology. NTUA Wireless anticipates it will offer voice service along with fixed and mobile broadband service with speeds ranging from 3Mbps up to 42Mbps down and 1Mbps up to 11Mbps up.
- 4. Contemplated service offerings: While NTUA Wireless has not yet identified the precise service or pricing that it will offer as part of the experiment, NTUA Wireless anticipates the pricing tiers will range from \$50 per month up to \$200 per month depending on the service and the number of locations targeted in the final experiment.
- 5. Expected State and or local government participation: NTUA Wireless is fully engaged with the Navajo Nation and Navajo Nation Telecommunications Regulatory Commission ("NNTRC"). NTUA Wireless will continue to work with the Navajo Nation and the NNTRC as it works toward developing a creative and efficient experiment.
- 6. High level estimate of one time or recurring funding requirements: Due to the extremely rural nature of the eligible census tracts identified in Attachment A and the low income status of many inhabitants, it is likely that recurring funding may be needed. Given that enormity of the territory and the limited amount of information that is currently available as it relates to the eligible areas and its population, it is difficult for NTUA Wireless to determine the costs of the project, thereby, provide an estimate of the funding requirement for the experiment.

Please contact the undersigned if you have any questions or need any clarification of the NTUA Wireless expression of interest. We eagerly look forward to working with the Commission in expanding the provision of broadband service to un-served and underserved areas of the USVI through the *Connect America Fund*.

Sincerely,

Wade McGill

Managing Director

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NTUA Wireless, LLC

NTUA Wireless, LLC Connect America Fund, WC Docket 10-90 Nonbinding Expression of Interest Attachment A

State	County	County Name	TractID	Eligible High Cost Locations	Extremely High Cost Locations	Annual Support
AZ	4001	Apache	4001942600	550	291	\$154,580
AZ	4001	Apache	4001942700	2252	898	\$881,875
AZ	4001	Apache	4001944000	751	129	\$307,223
AZ	4001	Apache	4001944100	1591	346	\$646,732
AZ	4001	Apache	4001944201	401	71	\$131,398
AZ	4001	Apache	4001944202	407	32	\$274,895
AZ	4001	Apache	4001944300	2162	571	\$1,032,754
AZ	4001	Apache	4001944901	1268	418	\$508,732
AZ	4001	Apache	4001944902	1691	538	\$799,868
AZ	4001	Apache	4001945001	294	21	\$88,928
AZ	4001	Apache	4001945002	389	77	\$205,732
AZ	4001	Apache	4001945100	80	31	\$37,679
AZ	4005	Coconino	4005002100	2	0	\$2,267
AZ	4005	Coconino	4005942201	958	446	\$375,306
AZ	4005	Coconino	4005942202	944	395	\$383,473
AZ	4005	Coconino	4005944900	116	7	\$19,097
AZ	4005	Coconino	4005945000	1216	512	\$387,024
AZ	4005	Coconino	4005945100	1083	523	\$336,835
AZ	4005	Coconino	4005945200	177	0	\$15,860
AZ	4017	Navajo	4017940008	537	274	\$233,086
AZ	4017	Navajo	4017940010	943	68	\$475,788
AZ	4017	Navajo	4017940011	869	212	\$487,986
AZ	4017	Navajo	4017940013	6	3	\$1,035
AZ	4017	Navajo	4017940014	734	280	\$315,440
AZ	4017	Navajo	4017940015	1278	546	\$543,103
AZ	4017	Navajo	4017942300	891	367	\$371,531
AZ	4017	Navajo	4017942400	1047	519	\$464,996
AZ	4017	Navajo	4017942500	179	20	\$71,189
NM	35001	Bernalillo	35001940600	107	17	\$50,486
NM	35006	Cibola	35006945800	846	272	\$404,973
NM	35006	Cibola	35006946100	722	42	\$281,295
NM	35031	McKinley	35031943500	468	170	\$183,594
NM	35031	McKinley	35031943600	1196	131	\$522,256
NM	35031	McKinley	35031943700	1068	321	\$470,500
NM	35031	McKinley	35031943800	1210	250	\$490,076
NM	35031	McKinley	35031943901	1147	165	\$519,720
NM	35031	McKinley	35031943902	527	98	\$281,767
NM	35031	McKinley	35031944000	762	273	\$324,042
NM	35031	McKinley	35031945700	864	272	\$407,510
NM	35031	McKinley	35031946000	1135	223	\$516,553
NM	35043	Sandoval	35043010900	494	188	\$499,004
NM	35045	San Juan	35045942801	899	191	\$394,631
NM	35045	San Juan	35045942802	313	4	\$54,349
NM	35045	San Juan	35045942803	86	0	\$25,301
NM	35045	San Juan	35045942900	2180	819	\$948,963
NM	35045	San Juan	35045943000	728	59	\$210,478
NM	35045	San Juan	35045943100	884	313	\$412,025
NM	35045	San Juan	35045943201	384	159	\$146,243
NM	35053	Socorro	35053940000	1	1	\$0
UT	49037	San Juan	49037942000	1367	701	\$518,683
UT	49037	San Juan	49037942100	825	308	\$354,979